

May 28, 1981

## Inspection Request KOI Petroleum - Detroit - Addendum

US EPA RECORDS CENTER REGION 5



482096

A.R. Winklhofer, Director, EDO

Bill Miner, Chief, Engineering Section, SEWHME

Attached are results of additional laboratory analyses on the tank contents at the subject facility. These were provided to MDNR by K&D Industrial Services, Inc. in April, 1980.

Unfortunately as with the previous data sets, MDNR and Nortru, there was no documentation provided on exact sample locations, the sampling protocol including handling and preservation, laboratory methods employed, and subsequent data reporting procedures. Note on the Nortru report that some units of measurement were not indicated, some were obviously incorrect, i.e., Flash Point in percent rather than degrees Fahrenheit and some parameters appear incorrect i.e., chlorine and bromine vs chloride and bromide (ions).

An attempt was made to obtain clarification of the data and some information was obtained, however, not enough has been obtained for extensive review and comparison of the data sets. Suffice it to say there appears to be significant differences among them.

Any future monitoring at this site should follow strictly the protocols established by the regulations (as referenced therein) and these protocols should be fully documented. Because of potential phase separation in the tank; reconnaissance should be made of each tank to locate alternate sampling ports and determine extent of phase separation. It is mandatory that unambiguous sample identification be used. I recommend that the parties use the established tank numbers painted on the tanks. Further sampling ports- hatch cover, access manhole, vent pipe, bottom drain, etc. be clearly named and shown on a sketch.

Orientation should be described, preferably in terms of a Facility North rather than true or magnetic. The intersecting streets of Lycaste and Freud should be assigned directions in terms of Facility North. Other dimensions should be referenced such as feet (meters) below hatch cover lip, etc.

Mr. Buckley indicates he has not as yet been able to obtain a copy of this referenced NFPA fire code and certain other EPA technical documents referenced in the RCRA regulations. Thus he is unable to provide additional information relative to the "buffer zone" for the tank farm.

Please contact Mr. Buckley at FTS 226-7269 should you have any questions.

 ELV  
 MICHIGAN DEPARTMENT OF ENVIRONMENTAL PROTECTION

## CONCURRENCES

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